

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

IN RE APPLICATION OF JOESLEY
MENDONCA BATISTA, WESLEY
MENDONCA BATISTA, FRANCISCO DE
ASSIS E SILVA, AND RICARDO SAUD
FOR AN ORDER TO TAKE DISCOVERY
FOR USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

Case No. _____

DECLARATION OF JARED NEWTON

Pursuant to 28 U.S.C. § 1746, I, Jared Newton, declare as follows:

1. I am an attorney duly admitted to practice in the Commonwealth of Virginia and before this Court. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Petitioners in this matter.

2. I respectfully submit this declaration in support of Petitioners Joesley Mendonça Batista (“Joesley Batista”), Wesley Mendonça Batista (“Wesley Batista”), Francisco de Assis e Silva (“De Assis”), and Ricardo Saud’s (“Saud”, collectively, “Petitioners”) *Ex Parte* Emergency Application And Petition For An Order To Conduct Discovery For Use In Foreign Proceedings Pursuant To 28 U.S.C. § 1782 (“Emergency Application”). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application and accompanying memorandum of law.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Proposed Order permitting discovery pursuant to 28 U.S.C. § 1782.

4. Attached hereto as **Exhibit 2** are true and correct copies of the proposed Subpoenas.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a Westlaw public records search report ran on Joan E. Meyer.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the LinkedIn profile of Joan Meyer.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a Google search for “Joan Meyer”.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Washington, D.C. on February 25, 2019.

Jared Newton
JARED NEWTON